

	COMPLAINTS POLICY AND PROCEDURES		
Monitor: Compliance Team	Approved by: Board of Directors		
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1 Executive summary and purpose

MarTrust Europe, S.A. (“**MarTrust**” or “**we**”) is a business unit operating under The Marcura Group (or “**Group**”). The purpose of this Complaints Policy (the “**Policy**”) is to document MarTrust’s approach to Complaints (defined below) received from existing or prospective customers (collectively, the “**Customers**”).

2 Scope

This Policy must be adhered to by all MarTrust employees.

3 Policy

The Group is wholly committed to ensuring that all Complaints received from Customer are taken seriously, dealt with in a fair and prompt manner and in accordance with applicable rules and regulations. As an entity regulated by *Banco de Portugal*, MarTrust must follow specific complaint handling rules to properly treat any Complaints received, regardless of the communication channel through which it has been submitted.

For the purposes of the applicable rules and regulations, a “**Complaint**” is defined as a statement of dissatisfaction addressed to a firm by a natural or legal person relating to the provision of a payment service (as defined in Article 4(3) of the Payment Service Directive), or issuance of electronic money as defined in Article 2(2) of the EMD (E-Money Directive).

For the purposes of this Policy, a **Complaint** includes, as defined by the applicable rules and regulations and includes, any expression of dissatisfaction, whether oral or written, about the company’s services, products, communication, processes, or conduct (including that of its employees, contractors, or representatives), where a response or resolution is explicitly or implicitly expected or legally required. This includes but is not limited to:

- Concerns about the quality, timeliness, or accuracy of services or deliverables.
- Allegations of unprofessional behaviour, rudeness, or poor customer service.
- Perceived failures to follow applicable laws, regulations, contractual obligations, or internal policies.
- Objections to decisions or outcomes where the individual believes a mistake has been made or their concerns have not been properly considered.

If not dealt with promptly and investigated thoroughly, a mishandled Complaint might lead to:

- reputational damage to MarTrust and the Group;
- imposition of fines;
- additional Complaints;
- weakening of the MarTrust’s operational processes;
- duplicated effort in terms of investigative resource when the same complaints reoccur;
- potential litigation; and/or
- fraudulent complaints.

This is why we perform a thorough and comprehensive review of Complaints as more particularly described below.

4 How can a customer log a complaint?

For any Customer wishing to log a Complaint, they are directed to raise it through any of the following channels:

- By letter addressed to MarTrust Europe S.A – Customer Support department, Av. da República, nº 6, 5º piso, salas 29 e 30, 1050-191 Lisbon, Portugal;
- By e-mail to info@martrust.com;
- Through the Complaints Book (Livro de Reclamações) available at MarTrust Europe S.A. office at Av. da República, nº 6, 5º piso, salas 29 e 30, 1050-191 Lisbon, Portugal; and
- Through the online Complaints Book (*Livro de Reclamações*) available at <https://www.livroreclamacoes.pt>

Customers can also complain directly to *Banco de Portugal* (BdP).

5 Procedure for handling a Complaint

Every effort shall be made to resolve the Complaint quickly and efficiently to the satisfaction of all parties and all communications should be made in Portuguese and English (except when the parties agree to use another language).

The recipient of the complaint (or “Recipient”) should ensure that all Customer communication is handled in a courteous, diplomatic, and professional way. If the Recipient is not a member of Customer Support Team, the Recipient must communicate immediately all relevant details in relation to the Complaint to the Customer Support Team.

The Recipient should follow the steps shown below:

- (a) On receipt of a Complaint, the Customer Support Team must:
 - Log the complaint on the Complaints register;
 - immediately inform the relevant Customer Relationship Manager (CRM)/Key Account Manager, unless they have received the Complaint communication through the CRM
 - gather as much relevant information as possible, which may include requesting additional documentation and/or obtaining input from other staff members to establish the facts surrounding the Complaint
- (b) If the Complaint indicates a potential breach of regulatory requirements, an incident form should be submitted in accordance with the internal procedures established
- (c) If the Complaint is deemed material by the Compliance or Risk Management Team assessing the Complaint, the Customer Support Team must inform the MarTrust Executive Committee.
- (d) Within 48 hours of receiving the Complaint, the Customer Support Team must send a formal acknowledgement to the Customer. This acknowledgement will serve to inform the Customer that their Complaint has been formally received and logged, and that further investigation is now being carried out. A copy of the acknowledgement shall be retained on the relevant Customer file
- (e) The Customer Support Team shall reply to the Complaint in writing or via such other means, within 15 business days from the date of receipt of the Complaint. If MarTrust is unable, for reasons beyond their control, to provide a response to the Complaint within this time frame, the Customer Support Team shall inform the Customer:
 - the reasons for the delay in responding; and
 - specifying the deadline for sending the final response which should be no later than within 35 business days of the date of receipt of the Complaint.

5.1 Escalation to the Compliance Team

If the Complaint relates to a breach of regulatory obligations, the Customer Support Team should promptly escalate such Complaint to the MarTrust Compliance Department and the Group Legal Department as provided below.

The Compliance Team will be responsible for initially assessing the Complaint with guidance provided by the Group Legal Department and will provide further guidance to Customer Support Team on how to reply to the Customer.

Depending on the severity of the Complaint assessed through the incident open communication to the Supervision team at BdP may be advisable, on top of the regular report of Complaints via BPnet.

5.2 Escalation to the Group Legal Department

The Group Legal Department should be informed immediately if:

- the Complaint relates to a regulatory breach;
- the Customer threatens legal action;
- the Customer is not satisfied with the resolution of the Complaint;
- the Customer has a Complaint which might affect our business relationship with them.

6 Complaints to *Banco de Portugal*

If a Customer makes a complaint to BdP, MarTrust is required to send, via BPnet, details of the Complaint received in the physical Complaints Book.

When reporting the complaints to BdP, the details of the Complaint, a copy of the letter sent to the Customer and other relevant documents should accompany the Complaint Report (Circular Letter No. 6/2008/DSB) to be submitted by the Customer Support Team.

MarTrust can submit Complaints through BPnet via the following methods:

(a) Manual data submission on BPnet

- (i) Select the “New Complaint” option and send the copy of the letter sent to the Customer and any other supporting documentation
- (ii) For subsequent submission of a claim, a copy of the letter sent to the Customer and other supporting documents related to a claim should be uploaded selecting the “Other Documentation” option. Sending documentation through the file transfer system: select the option “Report Complaints via file transfer”, following the instructions available on that page and then select the option “File transfer” to send the data.

If the Customer complained directly to the BdP, MarTrust must, within 20 working days, send a copy of the response given to the Customer and details of the resolution (Circular Letter No. 25/2008/DSB), and the option “Other Documentation” must be selected.

If the complaint refers to an unauthorized payment transaction, MarTrust must submit, along with the other documentation related to the complaint process, the form in Annex 1.

7 Alternative dispute resolution procedure

MarTrust offers the access to alternative dispute resolution mechanisms for disputes within the jurisdiction of the Portuguese Courts of First Instance and which wholly relate to information duties and other rights and obligations relating to accounts, payment accounts, transfers of funds and electronic money.

MarTrust has adhered to the following legal entities:

- “*Centro Nacional de Informação e Arbitragem de Conflitos de Consumo*” with registered office address at R. Dom Afonso Henriques no. 1, 4700-030 Braga, Portugal;
- “*Centro de Arbitragem de Conflitos de Consumo de Lisboa*” (CACCL) with registered office address at R. dos Douradores 112, 1100-207 Lisboa, Portugal.

For the resolution of cross-border disputes, MarTrust might recur to a legal entity that is a signatory of the Adhesion Protocol to the FIN-NET Network for cooperation in the alternative resolution of cross-border disputes in the financial sector.

8 Complaints Register and Complaints Book

The Customer Support Team must maintain a Complaints Register containing current and resolved Complaints and report the status to the MarTrust Management Team on a regular basis, or sooner, if the Complaint is deemed to be of public interest or if there are a series of Complaints which the management needs to be made aware.

The Responsible for the Compliance Function should be given access to the Complaints Register and supporting documentation.

A physical Complaints’ Book is kept in the registered office and the link for the Complaints’ Book online is available on MTE’s website.

9 Record keeping requirements

The Customer Support Team must keep a record of each Complaint received and the measures taken for its resolution and retain that record for five years after the Complaint was resolved.

10 Policy reviews

MarTrust will continuously review and amend this Policy, in accordance with relevant legislation, to ensure it remains compliant and to ensure its systems and controls are applied with due skill, care and diligence always.

11 Policy compliance

The Responsible for Compliance Function will verify compliance to this Policy through various methods, including but not limited to, business tool reports, internal and external audits. All MarTrust employees are required to adhere to this Policy.

Any exception to this Policy must be approved by the Responsible for Compliance Function after consultation with other relevant departments.

12 Ownership and responsibilities

The ownership of this Policy and the maintenance of its revisions rests with the Responsible for the Compliance Function. It is the responsibility of all the users of systems, organizations, or individuals with access to the Group's networks and resources, to establish and conform to the security measures outlined in this Policy.

All inquiries must be addressed to the Responsible for the Compliance Function.

13 Enforcement

A relevant employee found to have violated this Policy may be subject to:

- HR disciplinary procedures, up to and including termination of employment/contract; and/or

- Other actions as deemed appropriate by Management (e.g., additional training and development) and/or Department; and/or
- Civil or criminal liability under state, federal or international laws.

14 Further information

Further information can be obtained from the Legal Department and/or the Responsible for Compliance Function and the following resources:

- **Incident Report Form**
- **Template Acknowledgement of Complaint Letter**
- **Template Summary Resolution Letter**
- **Template Final Complaint Resolution Letter**
- **Letter of Complaint Resolution**
- **Template for reporting unauthorized payment transactions**

15 Regulatory documents:

- Decree-Law No. 156/2005
- Circular letter no. 6/2008/DSB, of 24/01/2008
- Circular letter no. 025/2008/DSB, of 26/03/2008
- Instruction of Banco de Portugal No. 18/2008
- EBA Guidelines on complaints-handling for the securities and banking sector